

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

Plaintiff,

v.

B4B EARTH TEA LLC, a limited liability  
company;

B4B CORP., a corporation; and

ANDREW MARTIN SINCLAIR, individually  
and as an officer of B4B EARTH TEA LLC and  
B4B CORP.,

Defendants.

**STIPULATION OF DISMISSAL  
WITH PREJUDICE**

**Civil Action No.: 22-CV-1159**

**Judge Eric N. Vitaliano**

**Magistrate Judge Robert M.  
Levy**

In light of the government's interest in redirecting its resources to more current priorities, and the particular circumstances of this case and these defendants, Plaintiff the United States of America and Defendant Andrew Martin Sinclair stipulate to the dismissal with prejudice of all claims and counterclaims in the above-captioned case. Both parties agree to be responsible for their own costs and fees.

DATED this 17 day of March 2025.

Respectfully submitted,

FOR DEFENDANT SINCLAIR:



March 17, 2025  
Mr. Andrew Martin Sinclair

FOR THE UNITED STATES OF AMERICA:

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/s/ James T. Nelson  
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**Application Granted**  
**SO ORDERED**  
**Brooklyn, New York**  
**Dated: 3/18/2025**

/s/ Eric N. Vitaliano  

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**Eric N. Vitaliano**  
**United States District Judge**

*The Clerk of Court is directed to close this case*